

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF CROSS-MOTION AND STATEMENT IN SUPPORT ON BEHALF OF
ASSURED GUARANTY CORP., ASSURED GUARANTY MUNICIPAL CORP., AMBAC
ASSURANCE CORPORATION AND FINANCIAL GUARANTY INSURANCE
COMPANY WITH RESPECT TO MOTION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO AMEND TENTH AMENDED CASE MANAGEMENT
PROCEDURES AND ADMINISTRATIVE PROCEDURES REGARDING
DISCLOSURE REQUIREMENTS PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2019**

PLEASE TAKE NOTICE that, upon the *Cross-Motion and Statement in Support
on Behalf of Assured Guaranty Corp, Assured Guaranty Municipal Corp., Ambac Assurance
Corporation and Financial Guaranty Insurance Company with Respect to Motion of the Official
Committee of Unsecured Creditors to Amend Tenth Amended Case Management Procedures and
Administrative Procedures Regarding Disclosure Requirements Pursuant to Federal Rule of*

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Bankruptcy Procedure 2019, (Case No. 17 BK 3283-LTS ECF No. 12216) (the “Cross-Motion”) Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, and Financial Guaranty Insurance Company (together “Movants”) will move this Court for an order amending the *Eleventh Amended Case Management Procedures and Administrative Procedures Regarding Disclosure Requirements Pursuant to Federal Rule of Bankruptcy Procedure 2019* (Case No. 17 BK 3283-LTS, ECF No. 11885-1) and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that any response or objection (any “Opposition”) to the Cross-Motion must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the Eleventh Amended Case Management Procedures (Case No. 17 BK 3283-LTS, ECF No. 11885-1) (the “Case Management Procedures”), and must be filed electronically with the Court by registered users of the Court’s case filing system, in searchable portable document format.

PLEASE TAKE FURTHER NOTICE that Movants have concurrently filed an urgent motion along with this notice to propose an opposition deadline and reply deadline for the Cross-Motion to ensure that the Cross-Motion is considered concurrently with the *Motion of the Official Committee of Unsecured Creditors to Amend Tenth Amended Case Management Procedures and Administrative Procedures Regarding Disclosure Requirements Pursuant to Federal Rule of Bankruptcy Procedure 2019* (ECF No. 11746) . The urgent motion proposes that any Opposition to the Cross-Motion must be filed and served by **March 17, 2020 at 5:00 p.m. (Atlantic Standard Time)** (the “Opposition Deadline”). The urgent motion further proposes that any reply or statements in support of the Cross-Motion must be filed and served by **March 24, 2020 at 5:00 p.m. (Atlantic Standard Time)** (the “Reply Deadline”).

PLEASE TAKE FURTHER NOTICE that if an Opposition to the Cross-Motion is not received by the Opposition Deadline, the relief requested shall be deemed unopposed, and the Court may enter an order granting the relief sought without a hearing pursuant to the Court's case management procedures.

Dated: March 10, 2020
New York, New York

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CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, 10th day of March, 2020.

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.*

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